

1. I make this declaration based on personal knowledge. If called upon to testify, I could and would testify competently to the following facts.
2. I attempted to check out *They Called Themselves the K.K.K.* from the Llano Library in April 2022. I was unable to check this book out because I was told by a librarian that it had been removed and was no longer available to be checked out in the Llano County Library System.
3. Nobody at the library told me that this book was available through an inter-library loan. Rather, I was only told that this book was not in the library catalogue.
4. I prefer physical books to digital books.
5. In or around May 2022, I became aware that the Library System had replaced OverDrive with Bibliotheca/cloudLibrary. I tried to use Bibliotheca/cloudLibrary but found it difficult to navigate.

6. I have never heard of “in-house checkout” at the Llano County libraries, nor have I received any instructions on how to access “in house checkout.” I would not use the “in-house checkout” system because it is inconvenient and because it would draw unnecessary attention to me and to the books I want to read.

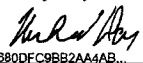
7. On July 15, 2022, I was told by a member of the Llano County Library Advisory Board that the Llano County Library System would not be purchasing any new books and had not purchased any new books since October 2021.

8. Defendants’ conduct has created an atmosphere of fear and distrust that goes beyond the removal of the books that I am aware have been pulled from shelves. Despite having made public statements reflecting that these books were removed due to their content, Defendants are now saying they were removed as part of a routine weed. Now, when I browse the library shelves, I am not sure whether books are missing for legitimate reasons, or because Defendants disagree with their content. This uncertainty has made me feel even less at home in Llano’s libraries, which had previously been a source of joy for me.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: July 28, 2022

By:

DocuSigned by:

680DFC9BB2AA4AB...
Richard Day

Civil Action No. 1:22-cv-00424-RP

4. I have previously used inter-library loans to read library books, but prefer not to use them. The last time I did so it cost me money, took three trips to the library to accomplish, and I only received one of three books that I ordered.

5. In or around May 2022, I became aware that the Library System had replaced OverDrive with Bibliotheca/cloudLibrary. I tried to use Bibliotheca/cloudLibrary but found it very difficult to use and librarians I asked for help were not able to assist me.

6. I have never heard of “in-house checkout” at the Llano County libraries. From its name, it sounds as though I could only read an “in-house checkout” book at a physical location, as opposed to checking it out from the system.

7. I find it exceedingly insulting. It is an obvious, poorly devised attempt to again deny equal and open access. All that this proposal could entail is contrary to what I know, reverse and have experienced in public libraries. Openly displayed, non-discriminatory multi-faceted subjects and different types of media is basic to a library experience. A library includes a comprehensive catalogue and is a place I can explore for new finds and new books. I don’t know how a library patron would even know this program exists. How would they find out which books were part of the “in-house checkout” program? Are the books in the catalog? Why are these books away from the general content of the library for preview and display? Are they notated with some special marking? This entire process makes a spectacle of the people that would want to inquire, preview or check these books out. The books I choose to check out, read or inquire about in a public library is generally protected and for good reason. It is personal and private. It should remain so.

8. The Llano library was a cool and quiet spot for me to visit in my jaunts to town. It was full of books and had computers and newspapers to explore and use. I wrote letters and made phone calls to my publicly elected officials when its trials became known to me. The citizens of Llano County, including myself and my husband, lost access to thousands of books through the shutdown of Overdrive for months. The shelves are now sparse. One room devoted

to young readers is often dark and the door is often closed. Certainly, our library is not the vibrant and welcoming space it once was. For me, their deceit, intimidation, and closed doors and closed minds have certainly made it very difficult to find that cool spot of refuge I once enjoyed. I miss it very much.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: July 28, 2022

By:

DocuSigned by:
Cynthia Waring
008E048F458549D
Cynthia Waring